

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

ZAKEYA STARKS

Case No.: 1:22-cv-00382

Plaintiff,

State Court Case No.: A2201970  
(removed from Hamilton County Court of  
Common Pleas)

v.

K.E.L.L.Y YOUTH SERVICES, INC.

**DEFENDANT K.E.L.L.Y YOUTH  
SERVICES, INC'S NOTICE OF  
REMOVAL**

Defendant

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Defendant K.E.L.L.Y Youth Services, Inc., pursuant to 28 USC §1332, and §1441, hereby gives notice to this Honorable Court and all parties to this action of their removal of this matter, currently pending as Case No. A2201970, in the Hamilton County Court of Common Pleas, Hamilton County, Ohio, to the United States District Court for the Southern District of Ohio, Western Division. In support of this Notice of Removal, Defendant states as follows:

1. On June 2, 2022, Plaintiff filed a lawsuit in the Hamilton County Court of Common Pleas, styled *Zakeya Starks v. K.E.L.L.Y Youth Services, Inc.*, and it was assigned case number A2201970.
2. The Complaint was served on the Defendant via certified mail and received on June 6, 2022.
3. The Complaint seeks damages on behalf of the Plaintiff under 42 USC §12101 (The Americans with Disabilities Act) and the Family First Corona Virus Relief Act (FFCRA) and Ohio Revised Code §4112.01 (The Ohio Civil Rights Legislation).

4. The Complaint alleges violation of the Federal Statutes over which this court has original jurisdiction and the Ohio Statutes on unlawful discriminatory practices over which this court would have supplemental jurisdiction.

5. Jurisdiction is appropriate before this Honorable Court on the basis of federal question and supplemental jurisdiction.

6. The United States District Court for the Southern District of Ohio, Western Division, is the proper federal district court for removal, as Hamilton County, Ohio is within the district. Accordingly, venue is appropriate pursuant to 28 USC §1441 as all actions asserted in Plaintiff's Complaint arise out of Hamilton County, Ohio.

7. Prior to removal the Defendant did not answer the Complaint.

8. Pursuant to 28 USC §1446, a copy of all pleadings and other papers filed in the State Court proceedings is attached as **Exhibit A**.

9. This Notice of Removal will be served on all parties pursuant to 28 USC §1446.

10. This Notice of Removal will be filed with the Hamilton County Clerk of Courts pursuant to 28 USC §1446.

Respectfully submitted,

/s/Patricia J. Trombetta  
Patricia J. Trombetta (0005451)  
Thomas F. Glassman (0061466)  
Bonezzi Switzer Polito & Hupp Co. LPA  
312 Walnut Street, Suite 2530  
Cincinnati, Ohio 45202  
Phone: 513.345.5503  
Fax: 513.345.5510  
[ptrombetta@bsphlaw.com](mailto:ptrombetta@bsphlaw.com)  
[tglassman@bsphlaw.com](mailto:tglassman@bsphlaw.com)  
*Attorneys for Defendant K.E.L.L.Y  
Youth Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served this 1<sup>st</sup> day of July, 2022, via email upon the following:

Evan R. McFarland, Esq.  
Matthew G. Bruce, Esq.  
Brianna R. Carden, Esq.  
Spitz Law Firm  
Spectrum Office Tower  
11260 Chester Road, Suite 825  
Cincinnati, Ohio 45246  
[Matthew.bruce@spitzlawfirm](mailto:Matthew.bruce@spitzlawfirm)  
[Evan.mcfarland@spitzlawfirm.com](mailto:Evan.mcfarland@spitzlawfirm.com)  
[Brianna.carden@spitzlawfirm.com](mailto:Brianna.carden@spitzlawfirm.com)

*Attorneys for Plaintiff*

/s/Patricia J. Trombetta  
Patricia J. Trombetta, Esq.